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July 25, 2018

**Via ECF**

Honorable Magistrate Judge Robert M. Levy  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Gary Valenti, Inc. v. Citibank, N.A.  
Civil Action No. 18-cv-1575-FB-RML**

Dear Magistrate Judge Levy:

We represent Plaintiff Gary Valenti, Inc. in the above-referenced matter. Pursuant to the Court's text order, the parties are due to report whether they wish to have settlement negotiations.

We respectfully request that the Court order a settlement conference with party representatives present. We believe that we have a strong likelihood of success on the merits and that we would defeat any motion for summary judgment filed by Citibank. However, given the amount in controversy and in the interest of resolving the claims in an efficient manner, we believe that Court-assisted settlement negotiations would be beneficial at this time.

Alternatively, we respectfully request that the Court set a discovery schedule for the matter.

Thank you for your kind attention to this matter.

Respectfully submitted,

*s/ Sarah H. Morrissey*

Sarah H. Morrissey, Esq.

cc. Anthony Giacobbe, Esq. (Via ECF)  
*Attorney for Citibank, N.A.*